

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	Case No. 09-35697
My Ranch, Inc.	)	
d/b/a Fresh Harvest Market	)	
	)	Judge Schmetterer
Debtor and Debtor in Possession	)	
	)	
	)	Chapter 11
Cecilia N. Johnson	)	Case No. 09-37011
	)	
Debtor and Debtor in Possession	)	Hearing: February 16, 2010 at 10:00 a.m.

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that I will appear on February 16, 2010 at 10:00 a.m. before the Honorable Jack B. Schmetterer, or any other Judge sitting in his stead, in Courtroom 682, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present the **Debtors' Motion to Extend the Deadline to File Objections to Proofs of Claim**, and request entry of orders in accordance with the motion. AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD.

/s/ Forrest L. Ingram  
One of Debtor's attorneys

Forrest L. Ingram, P.C.  
Forrest L. Ingram #3129032  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Philip Groben, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, as set forth on the attached service list, on February 16, 2010.

/s/ Philip Groben

## SERVICE LIST

### **VIA CM/ECF**

#### **William T. Neary**

Office of the U.S. Trustee, Region 11  
219 S. Dearborn St., Room 873  
Chicago, IL 60604  
[USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

#### **National City Commercial Capital Company, LLC**

#### **Vincent T Borst**

Borst & Collins, LLC  
180 N Stetson Ave Suite 3050  
Chicago, IL 60601

#### **The Huntington National Bank**

#### **Monette W Cope**

Weltman Weinberg & Reis Co LPA  
180 North LaSalle St Ste 2400  
Chicago, IL 60601

#### **Illinois Department of Revenue**

#### **Faith Dolgin**

Illinois Attorney General  
100 W Randolph St 13th Floor  
Chicago, IL 60601

#### **Coactiv Capital Partners, Inc.**

#### **David P. Vallas**

Wildman Harrold Allen & Dixon  
225 West Wacker Drive  
Chicago, IL 60606  
312 201-2192

### **VIA U.S. MAIL**

My Ranch, Inc.  
4650 N. Sheridan Rd  
Chicago, IL 60640

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FOR THE NORTHERN DISTRICT OF ILLINOIS  
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	)	Case No. 09-35697
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Debtor and Debtor in Possession	)	Judge Schmetterer
	)	
	)	Chapter 11
Cecilia N. Johnson	)	Case No. 09-37011
	)	
Debtor and Debtor in Possession	)	Hearing: February 16, 2010 at 10:00 a.m.

**MOTION TO EXTEND TIME TO FILE OBJECTIONS TO PROOFS OF CLAIM**

Now comes the Debtors and Debtors in Possession, My Ranch, Inc. (“My Ranch”) and Cecilia N. Johnson (“Johnson”), by and through their attorneys, Forrest L. Ingram, P.C., and moves this Honorable Court for Extension of Time to File Objections to Proofs of Claim. In support thereof, the Debtor states as follows:

1. My Ranch filed its Chapter 11 bankruptcy case on September 25, 2009.
2. Johnson filed her chapter 11 bankruptcy case on October 5, 2009.
3. On January 5, 2010, this Court entered an order granting My Ranch and Johnson’s joint motions for Joint Administration in the lead case 09-35697.
4. This Court set January 29, 2010 as the last day to file objections to proofs of claim
5. The majority of proofs of claim filed with the Court in My Ranch’s bankruptcy case involve claims which arise from leases entered into by My Ranch. Johnson acted as a personal guarantor on most, if not all, of those leases.
6. On January 29, 2009, this Court entered sixteen orders rejecting leases entered into by the Debtor prior to its filing for bankruptcy. Prior to the entry of these orders, the Debtor had

entered into settlement negotiations with the leaseholders in an attempt to resolve control of various pieces of equipment, and the claims of each creditor.

7. In drafting a chapter 11 plan of reorganization, the Debtors had intended to rely on a 90 day window of claim objections through operation of a plan of reorganization. It came to the Debtors' attention on February 9, 2010, that this Court will not allow a chapter 11 plan to extend or create a time to file objections to proofs of claim.

8. Pursuant to Rule of Bankruptcy Procedure 9006(b)(1) reads:

Except as provided in paragraphs (2) and (3) of this subdivision, when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order or (2) on motion made after the expiration of the specified period permit the act to be done where the failure to act was the result of excusable neglect.

9. Due to the above mentioned circumstances, the failure to act by the Debtors is the result of excusable neglect, and upon this motion the Court may extend the time given to the Debtors' to file objections to proofs of claim.

WHEREFORE, the Debtors, My Ranch, Inc. and Cecelia N. Johnson respectfully requests that this Honorable Court extend the deadline for Debtor to file objections to proofs of claim to March, 18, 2010, and grant the Debtor such other and further relief as this Court deems just and equitable.

Respectfully submitted,

MY RANCH, INC. and  
CECELIA N. JOHNSON

By: /s/ Forrest L. Ingram  
One of its attorneys

Forrest L. Ingram #3129032

Philip Groben

Vic Chaudhry

Michael Ohlman

Forrest L. Ingram P.C.

79 West Monroe, Suite 900

Chicago, Illinois 60603

(312) 759-2838